

FILED

JUN 27 2013

U. S. DISTRICT COURT  
E. DIST. OF MO.  
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

V.

BRANDY LEMONS,

Defendant.

No.

4: 13CR00.258.HEA

**INDICTMENT**

**COUNT ONE**

The Grand Jury charges:

On or about June 15, 2009, in the Eastern District of Missouri, the defendant,

## BRANDY LEMONS,

in a matter within the jurisdiction of the Social Security Administration, an agency of the United States, did knowingly and willfully make and cause to be made a false, fictitious, and fraudulent statement and representation as to a material fact and did make and use and cause to be made and used a false document, knowing the same to contain a materially false, fictitious and fraudulent statement, in that, on Form SSA-3368 EDCS, entitled "Disability Report-Adult," did state and represent and cause to be stated and represented that a GED was the highest educational grade she completed when in truth and in fact, as **BRANDY LEMONS**, then well knew, she attended Austin Peay State University in Clarksville, Tennessee between 2003 and 2007 and obtained more than 20 college credits.

In violation of Title 18, United States Code, Section 1001.

## COUNT TWO

The Grand Jury further charges:

On or about October 12, 2011, in the Eastern District of Missouri, the defendant,

**BRANDY LEMONS,**

in a matter within the jurisdiction of the Social Security Administration, an agency of the United States, did knowingly and willfully make and cause to be made a false, fictitious, and fraudulent statement and representation as to a material fact and did make and use and cause to be made and used a false document, knowing the same to contain a materially false, fictitious and fraudulent statement, in that, on Form SSA-454-BK, entitled "Continuing Disability Review Report," did state and represent and cause to be stated and represented that between May 28, 2010 and October 11, 2011 she had no hobbies or interests, could not pick up anything over 20 pounds without causing increased pain, and sitting more than 30 minutes caused additional pain when in truth and in fact, as **BRANDY LEMONS**, then well knew, that between on or about August 1, 2011 and October 11, 2011, defendant: attended hunter safety classes; bent and lifted objects and people; hunted deer during bow season; regularly practiced bow hunting with a 30 pound compound bow; attended a concert; and, rode an all-terrain vehicle two hours.

In violation of Title 18, United States Code, Section 1001.

**COUNTS THREE THROUGH FIVE**

The Grand Jury further charges that:

On or about the dates listed below, within the Eastern District of Missouri,

**BRANDY LEMONS,**

the defendant herein, did embezzle, steal, purloin, or knowingly convert to her use money of the United States or of any department or agency thereof, or any property made or being made under contract for the United States or any department or agency thereof, to wit: government funds in the amounts listed below:

<u>COUNT</u>	<u>DATE</u>	<u>AMOUNT</u>
3	October 12, 2011	\$802.00
4	November 9, 2011	\$802.00
5	June 13, 2012	\$731.00

All in violation of Title 18, United States Code, Section 641.

A TRUE BILL.

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FOREPERSON

RICHARD G. CALLAHAN  
United States Attorney

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TRACY L. BERRY, 014753 TN  
Assistant United States Attorney